

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

Chapter 11

Case No. 08-13555-scc

[PROPOSED] ORDER TO SHOW CAUSE

This matter having come before this Court by the *ex parte* application (the “Application”) of Stearns Lending, LLC f/k/a Stearns Lending, Inc. (“Stearns Lending”), for the entry of an order to show cause, granting a stay, and seeing a hearing on an expedited basis on Stearns Lending’s motion (“Motion”) for entry of an order pursuant to *Rule 60(b)(6)* of the *Federal Rules of Civil Procedure* seeking to vacate the “Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Seller, Stearns Lending, LLC f/k/a Stearns Lending, Inc.”, (the “Order”) and the Court having considered the Application, and for good cause shown, it is hereby:

ORDERED, that the Defendants show cause before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, United States Bankruptcy Court, One Bowling Green, Room 623, New York, NY 10004-1408, on the _____ day of _____, 2015 at 10:00 a.m., or as soon thereafter as counsel can be heard, why an order should not be issued and entered vacating the Order.; and it is further

ORDERED that Stearns Lending’s obligation to respond to the Indemnification ADR Package within twenty-eight (28) days of its service by LBHI is hereby stayed pending the entry of a further order by this Court; and is further

ORDERED that service of a copy of this Order and Motion shall be made upon Wollmuth Maher & Deutsch LLP, counsel for LBHI by express overnight mail no later than _____, 2015, which service shall be deemed good and sufficient service thereof; and it is further

ORDERED that to the extent LBHI desires to respond to the Motion, such response must be served on Blank Rome LLP, counsel for Stearns Lending, no later than _____, 2015; and it is further

ORDERED that the reply papers of Stearns Lending, if any, must be served on or before _____, 2015.

Dated: New York, New York
February ___, 2015

UNITED STATES BANKRUPTCY JUDGE